

Office of the Secretary
Federal Communications Commission
Washington, D. C. 20554

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Ref: PR Docket 92-235

To Whom it May Concern:

I am corresponding concerning PR Docket 92-235. I am opposed to the "Refarming" of the frequency spectrum. This would place a totally unmanageable condition on every aspect of the economy. In particular I am concerned with the volunteer emergency service. This type of service operates with minimum funding and would not be in a position in the near future to purchase a complete communications system.

I further understand the technical issues would prevent tone and voice paging as we use it today. This is the primary way for the volunteer emergency service to alert their membership of an emergency. In El Paso County there are elevations ranging from 5000 feet to 14,000 feet with fire loading to 10,000 feet that require response of emergency services. With the proposed changes the absence of medium to high power transmitters would prohibit a workable system over this varied terrain and the wide response distances. These are but a few of the issues that need additional research and development prior to any massive change of part 90.

I am of the opinion that the problem of frequency congestion should be addressed area by area and solutions developed for each particular set of circumstances. These solutions would require modifications to portions of part 90 and could include, but not limited to, low power cellular type systems, trunking, to include UHF, VHF, and with additional guarding processes, possibly lo-band systems. The final solutions must take advantage of new technologies while allowing existing systems to co-exist with minor kit type modifications.

Thank you for your considerations.

Yours Truly:

James Kenneedy
Treasurer, Edison Vol. fire dept.